IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

AMERICAN NATIONAL)	
INSURANCE COMPANY,)	
Plaintiff,)	
)	
v.)	C.A. No. 06-237(KAJ)
)	
RUTH A. WILDS and JOAN L. GEIGER,)	
Defendants.)	

INITIAL DISCLOSURES

- (A) The parties and witnesses to the execution of change of beneficiary. In addition, her physician Paul A. Donaher, M.D. See attached.
- (B) Please see the attached documents in the possession of Ruth A. Wilds. Additional documents will be provided upon receipt.
 - (C) Damages total the amount of the annuity that has been deposited with the Court.
 - (D) N/A

Donald L. Gouge, Jr. (DSB # 2234) 800 King Street, Suite 303 Wilmington, DE 19801 (302) 658-1800x2 Attorney for Ruth A. Wilds

Date: November 29, 2006

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INSURANCE COMPANY,)	
Plaintiff,)	
)	
v.)	C.A. No. 06-237(KAJ)
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Defendants.)	

CERTIFICATE OF SERVICE

The undersigned certifies that on the date listed below that Ruth A. Wilds' initials disclosures and first set of discovery was sent to counsel of record and this notice was filed with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the individual(s) noted below. The document is available for viewing and downloading from CM/ECF. I also served a hard copy as indicated below:

John F. Brady, Esquire P.O. Box 742 Georgetown, DE 19947 (U.S. Mail)

HEIMAN, GOUGE & KAUFMAN, LLP

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Date: November 29, 2006